

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

NOTICE OF MOTIONS AND HEARING

PLEASE TAKE NOTICE that on January 31, 2019, USA Gymnastics, as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), filed the following motions, applications, and supplement (collectively, the “**Motions**”), which have been set for a hearing (the “**Hearing**”) on **February 21, 2019 at 1:30 p.m. (Prevailing Eastern Time) in Room 329 of the United States Bankruptcy Court, 46 East Ohio Street, Indianapolis, Indiana 46204:**

- *Debtor’s Motion For Order Establishing Deadlines For Filing Proofs Of Claim And Approving Form And Manner Of Notice Thereof* [Dkt. 230];
- *Debtor’s Motion For Order Authorizing The Debtor To Assume Executory Contract With Spencer Stuart Pursuant To 11 U.S.C. § 365* [Dkt. 223];
- *Debtor’s Motion For Order Extending Period Within Which It May Remove State Court Actions Pursuant To 28 U.S.C. § 1452 And Rule 9027 Of The Federal Rules Of Bankruptcy Procedure* [Dkt. 222];
- *Debtor’s Application For Order Authorizing The Debtor To Employ APCO Worldwide LLC As Ordinary Course Communications Advisor Pursuant To 11 U.S.C. § 327(b), Effective As Of The Petition Date* [Dkt. 228];
- *Debtor’s Application For Order Authorizing The Debtor To Employ Barnes & Thornburg LLP As Ordinary Course Counsel Pursuant To 11 U.S.C. § 327(b), Effective As Of The Petition Date* [Dkt. 229];

¹ The last four digits of the Debtor’s federal tax identification number are 7871. The location of the Debtor’s principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

- *Debtor's Application For Order Authorizing The Debtor To Employ Pierce Atwood LLP As Ordinary Course Counsel Pursuant To 11 U.S.C. § 327(b), Effective As Of The Petition Date* [Dkt. 226];
- *Debtor's Application For Order Authorizing The Debtor To Employ Zuckerman Spaeder LLP As Ordinary Course Counsel Pursuant To 11 U.S.C. § 327(b), Effective As Of The Petition Date* [Dkt. 227]; and,
- *Supplement To First Day Motion For (I) Approval Of The Debtor's Continued Use Of Cash Management System; (II) Authorizing Financial Institutions To Honor And Process Checks And Transfers Related To Such Obligations; And (III) Waiving The Requirements Of 11 U.S.C. § 345(b)* [Dkt. 225].

PLEASE TAKE FURTHER NOTICE that in addition to the Motions, the Debtor filed its *Notice Of Withdrawal Of Supplement To First Day Wages Motion* [Dkt. 224]. Accordingly, the *Motion For An Order (I) Authorizing The Debtor To Pay And Honor Certain Pre-Petition Wages, Benefits, And Other Compensation Obligations; And (II) Authorizing Financial Institutions To Honor And Process Checks And Transfers Related To Such Obligations* [Dkt. 11], for which relief has been granted on an interim basis, will be heard on a final basis at the **February 21, 2019 at 1:30 p.m. (Prevailing Eastern Time) Hearing.**

PLEASE TAKE FURTHER NOTICE that certain of the Motions seek the Court's authorization for the Debtor to employ law firms as counsel and to pay the fees and expenses of those law firms.

PLEASE TAKE FURTHER NOTICE **that any objections to the Motions must be filed by Thursday, February 14, 2019 at 4:00 p.m. (Prevailing Eastern Time), via the Court's ECF system.**

PLEASE TAKE FURTHER NOTICE that a dial-in telephone number for interested parties to participate in the Hearing by conference call is 1-888-273-3658, passcode: 9247462#. All callers shall keep their phones muted unless addressing the Court. All callers must identify

themselves and the party(ies) they represent when addressing the Court. Callers shall not place their phones on hold during the Hearing.

PLEASE TAKE FURTHER NOTICE that copies of the Motions may be accessed through the case website at: <https://omnimgt.com/usagymnastics>, or by contacting the Debtor's attorneys, on PACER, or from the Clerk of the Court.

Dated: January 31, 2019

Respectfully submitted,

JENNER & BLOCK LLP

By: /s/ Catherine Steege

Catherine L. Steege (admitted *pro hac vice*)
Dean N. Panos (admitted *pro hac vice*)
Melissa M. Root (#24230-49)
353 N. Clark Street
Chicago, Illinois 60654
Tel: (312) 923-2952
Fax: (312) 840-7352

csteege@jenner.com
dpanos@jenner.com
mroot@jenner.com

Counsel for the Debtor